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March 16, 2022

VIA CM/ECF

Hon. Judge Valerie Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 240
New York, NY 10007

RE: Rusis et al. v. International Business Machines Corp., C.A. No. 1:18-cv-08434

Dear Judge Caproni:

On March 9, 2022, Plaintiffs filed a redacted version of the Affidavit of Shannon Liss-Riordan (Dkt. 251) in Opposition to Defendant's Motion for Summary Judgment as to the ADEA Claims of Plaintiffs Who Filed Untimely Charges, an Untimely Lawsuit, or Fall Outside the Temporal Scope of the Representative Administrative Charges (Dkt. 207).

We discovered yesterday that incorrect versions of Exhibits 13, 14, and 15 were uploaded as attachments to Dkt. 251. Plaintiffs thus attach the correct, redacted exhibits hereto. Plaintiffs respectfully request leave to submit these corrected versions of the exhibits to replace the incorrectly filed versions.¹

Sincerely,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
Counsel for Plaintiffs

cc: All counsel of record

¹ Should the Court prefer that Plaintiffs resubmit all 35 exhibits, Plaintiffs will do so.